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United States Attorney  
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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY 10.19321397  
BITCOIN,  
15 Defendant.  
16

2:21-CV-02353-TLN-DB

DECLARATION OF TAMMY TEGLIA IN  
SUPPORT OF REQUEST TO CLERK FOR  
ENTRY OF DEFAULT AGAINST TARUN  
KUMAR ARORA

17  
18 I, TAMMY TEGLIA, declare as follows:

19 1. I am the Paralegal Specialist assigned to the above-captioned civil forfeiture action.

20 2. I have personal knowledge of the following matters, except those stated on information  
21 and belief, and as to those matters I believe them to be true, and if called as a witness in this proceeding,  
22 after being duly sworn, I could and would competently testify thereto.

23 3. To the best of my knowledge and belief, Tarun Kumar Arora is not an infant nor is he an  
24 incapacitated person.

25 4. To the best of my knowledge and belief, Tarun Kumar Arora is not in the military service  
26 of the United States, within the meaning of the Servicemembers Civil Relief Act of 2003. (50 U.S.C.  
27 App. §§ 501-596).

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5. On March 10, 2022, the United States sent copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, and court notices to Tarun Kumar Arora via email pursuant to the Order Permitting Direct Notice of Complaint for Forfeiture by Email filed March 10, 2022. The email was sent to Tarun Kumar Arora at the following email addresses: tarun\_0085@rediffmail.com and tarun13335@gmail.com. A true and correct copy of the email and letter sent to Tarun Kumar Arora are attached as Exhibit A.

6. To date, no claim or answer has been filed by or on behalf of Tarun Kumar Arora, as required by Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and his time to file a claim and answer has expired.

7. The defendant funds were arrested on March 7, 2022, by the U.S. Secret Service. See Process Receipt and Return filed March 8, 2022.

8. Beginning on January 8, 2022, for at least thirty consecutive days, the United States published Notice of the Forfeiture Action on the official internet government forfeiture site [www.forfeiture.gov](http://www.forfeiture.gov). A Declaration of Publication was filed on March 2, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14<sup>th</sup> day of May, 2022.

*Tammy Teglia*  
Tammy Teglia  
Paralegal Specialist

# EXHIBIT A

**Teglia, Tammy (USACAE)**

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**From:** Teglia, Tammy (USACAE)  
**Sent:** Thursday, March 10, 2022 2:22 PM  
**To:** tarun\_0085@rediffmail.com; tarun13335@gmail.com  
**Subject:** U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB  
**Attachments:** potential clmnt ltr Arora.pdf; Complaint filed 12 17 21.pdf; publ app & ord filed 1 6 22.pdf; arrest warrant clerks issued 1 4 22.pdf; Ord re Service and JSR.pdf; Ord Re Filing Requirements.pdf; Mag Judge Consent ntc.pdf; Voluntary Dispute Resolution ntc.pdf

Mr. Tarun Kumar Arora,

Please see the attached Notice of Forfeiture Action along with the court documents referenced in the notice. This is related to the Bitcoin seized pursuant to a Federal seizure warrant that was held in User ID 25002089/User ID Number R8750839 at Binance.

Let me know if you have questions.

Tammy Teglia  
Paralegal Specialist  
Asset Forfeiture Unit  
USAO - Eastern District of California  
916/554-2768

“CONFIDENTIALITY NOTICE: This communication with its contents and attachments, if any, may contain confidential, law enforcement sensitive, privileged attorney/client communications or work products, and is not subject to disclosure. It is solely for the use of the intended recipients. Unauthorized interception, review, use or disclosure is prohibited. If you believe that you have received this email in error, please notify the sender immediately, and permanently delete the email, any attachments, and all copies from your computer.”



**U.S. DEPARTMENT OF JUSTICE**

*United States Attorney  
Eastern District of California*

*Phillip A. Talbert  
United States Attorney*

501 I Street, Suite 10-100  
Sacramento, CA 95814

Phone 916/554-2700  
Fax 916/554-2900  
TTD 916/554-2855

March 10, 2022

VIA EMAIL

**NOTICE OF FORFEITURE ACTION**

Tarun Kumar Arora  
Email addresses: [tarun\\_0085@rediffmail.com](mailto:tarun_0085@rediffmail.com)  
and [tarun13335@gmail.com](mailto:tarun13335@gmail.com)

Re: U.S. v. Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

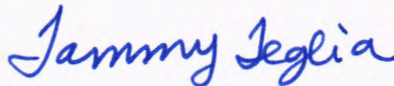
If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. *See* 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, *see* 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. *See* 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert  
United States Attorney



TAMMY TEGLIA  
Paralegal Specialist  
Asset Forfeiture Unit

Enclosures